



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 09 2018

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Christopher Bender, Environmental Compliance Coordinator
Utica East Ohio Midstream LLC
Harrison Hub Fractionation Plant
37905 Crimm Road
Scio, Ohio 43988

Re: Finding of Violation
Utica East Ohio Harrison Hub Fractionation Plant
Scio, Ohio

Dear Mr. Bender:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Utica East Ohio Midstream LLC, Harrison Hub Fractionation Plant (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the (1) Standards of Performance for Crude Oil and Natural Gas Production (Subpart OOOO); (2) Standards of Performance for Equipment Leaks of Volatile Organic Compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry (Subpart VVa); (3) Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (Subpart Db); and (4) Standards of Performance for Volatile Organic Liquid Storage Vessels (Subpart Kb) at your Scio, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Luke Hullinger. You may call him at (312) 886-3011 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Nam', written in a cursive style.

Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Bob Hodanbosi, Chief
Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

Jessica Kuenzli
Southeast District Office
jessica.kuenzli@epa.ohio.gov

1. Section 111(b) of the CAA, 42 USC § 7411(b), requires EPA to list categories of sources, which cause or contribute significantly to air pollution that may reasonably be anticipated to endanger public health or welfare, and to promulgate standards of performance for new stationary sources within these categories. These standards are known as “new source performance standards” or “NSPS.”
2. Section 111(e) of the CAA, 42 USC § 7411(e), prohibits the owner or operator of any stationary source from operating in violation of any standard of performance.

Subpart OOOO – Findings and Violations

3. NSPS Subpart OOOO (40 C.F.R. §§ 60.5360 – 60.5430) establishes emission standards and compliance schedules for, among other things, volatile organic compound (VOC) emissions from affected facilities that commenced construction, modification, or reconstruction after August 23, 2011. 40 C.F.R. § 60.5360.
4. Pursuant to Subpart OOOO at 40 C.F.R. § 60.5365, the affected facilities to which Subpart OOOO applies include the group of all equipment (except compressors) within a process unit that is located at an onshore natural gas processing plant.
5. Subpart OOOO at 40 C.F.R. § 60.5430 defines “equipment” to mean “each pump, pressure relief device, open-ended valve or line, valve, and flange or other connector that is in VOC service or in wet gas service, and any device or system required by this subpart.”
6. Subpart OOOO at 40 C.F.R. § 60.5430 defines “process unit” to mean components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products.
7. Subpart OOOO at 40 C.F.R. § 60.5430 defines a “natural gas processing plant (gas plant)” as “any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.”
8. Subpart OOOO at 40 C.F.R. § 60.5400 sets forth equipment leak standards that apply to affected facilities at an onshore natural gas processing plant. This section applies to the group of all equipment, except compressors, within a process unit.
9. Subpart OOOO at 40 C.F.R. § 60.5400(a) specifies, as relevant, that each affected facility must comply with the equipment leak requirements of Subpart VVa at 40 C.F.R. §§ 60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a., except as provided in § 60.5401.
10. Subpart OOOO at 40 C.F.R. § 60.5400(f) specifies that “each piece of equipment is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service.”
11. UEOM owns and operates the Harrison Hub Fractionation Plant, an onshore natural gas processing plant, located at 37905 Crimm Road, Scio, Ohio 43988, which separates natural gas feed into separate ethane, butane, and gasoline fractions. The Plant commenced construction or modification after August 23, 2011 and on or before September 18, 2015.

12. EPA inspectors conducted an inspection of the Plant on September 25 – 28, 2017. During the inspection, among other things, inspectors took field measurements using a Toxic Vapor Analyzer and a Forward Looking Infrared (FLIR) camera, and requested information and records, including the Plant's Leak Detection and Repair (LDAR) database that is used to comply with Subpart OOOO at 40 C.F.R. §§ 60.5421 and 60.5422.
13. Based on the September 2017 inspection, evaluation of the field measurement, and information and records obtained during the inspection, EPA determined UEOM's Harrison Hub Fractionation Plant is in violation of the below specified provisions.

Subpart VVa – Findings and Violations

Pumps – Initial Monitoring

14. Subpart VVa at 40 C.F.R. § 60.482-2a(a)(1) states “[e]ach pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in § 60.485a(b), except as provided in § 60.482-1a(c) and (f) and paragraphs (d), (e), and (f) of this section. A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup period.” See also Applicability Determination Index (ADI) Control Number 1200052, “Request for Clarification of Initial Monitoring Requirement for Pumps and Valves for New Process Units,” dated October 28, 2011.
15. The Plant's LDAR database designates the pumps listed in Attachment A as in light liquid service and does not designate any exemption from monthly monitoring.
16. For the pumps listed in Attachment A, by process unit, startup of process unit, and initial monitoring date, UEOM violated 40 C.F.R. § 60.482-2a(a)(1) by failing to perform the initial monthly monitoring within 30 days after the end of the startup period.

Valves – Initial Monitoring

17. Pursuant to Subpart VVa at 40 C.F.R. § 60.482-7a(a)(1) and (a)(2)(ii), subject to certain exemptions, each valve in gas/vapor or light liquid service must be monitored monthly and must be monitored for the first time within 30 days after startup. See also ADI Control Number 1200052.
18. The Plant's LDAR database designates the valves listed in Attachment B as in gas vapor or light liquid service and does not designate any exemption from monthly monitoring.

19. In reviewing UEOM's LDAR database provided during the September 2017 inspection, EPA discovered 9441 valves that were not monitored initially within 30 days after startup (See Attachment B)
20. For the 9441 valves listed in Attachment B, by process unit, startup of process unit, and initial monitoring date, UEOM violated 40 C.F.R. § 60.482-7a(a)(1) and (a)(2)(ii) by failing to perform the initial monthly monitoring within 30 days after the end of the startup period.

Enclosed Combustion Devices – Initial Performance Test

21. The requirements under Subpart VVa at 40 C.F.R. § 60.482-10a apply to closed vent systems and control devices used to comply with provisions of Subpart VVa, including pressure relief devices controlled under Subpart VVa at 60.482-4a(c).
22. Subpart VVa at 40 C.F.R. § 60.481a defines "closed vent system," in part, as a "system that . . . transport[s] gas or vapor from a piece or pieces of equipment to a control device."
23. Subpart VVa at 40 C.F.R. § 60.481a defines "control device" as "an enclosed combustion device, vapor recovery system, or flare."
24. Pursuant to 40 C.F.R. § 60.482-10a(c), enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 ppmv, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C.
25. Subpart VVa at 40 C.F.R. § 60.482-1a(a) requires an owner or operator to demonstrate compliance for each piece of equipment within 180 days of initial startup, and the NSPS General Provisions at 40 C.F.R. § 60.8 requires an initial performance test to be completed not later than 180 days after initial startup.
26. The Plant includes two enclosed combustors that are used in part to control emissions from pressure relief devices. The enclosed combustors are: The John Zink model (VIN 900-SK25.006) installed in December 2015, and the Jordan Technologies model (VIN JT-VCU-2600-1-1) installed in June 2013.
27. During the September 2017 inspection, EPA requested documentation of the initial performance tests demonstrating compliance with the enclosed combustor standards. UEOM did not provide documentation or UEOM did not conduct initial performance tests.

28. By failing to conduct initial performance tests within 180 days of startup to demonstrate compliance for the John Zink model (VIN 900-SK25.006) enclosed combustor, UEOM violated 40 C.F.R. § 60.482-1a(a), and 40 C.F.R. § 60.8.
29. By failing to conduct initial performance tests within 180 days of startup to demonstrate compliance for the Jordan Technologies model (VIN JT-VCU-2600-1-1) enclosed combustor, UEOM violated 40 C.F.R. § 60.482-1a(a), and 40 C.F.R. § 60.8.

Truck Loading System – Open-Ended Lines

30. Pursuant to Subpart VVa at 40 C.F.R. § 60.482-6a(a), subject to certain exemptions, each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve that shall seal the open end at all times.
31. Subpart VVa at 40 C.F.R. § 60.481a defines “open-ended valve or line” as “any valve, except safety relief valves, having one side of the valve seat in contact with process fluid and one side open to the atmosphere, either directly or through open piping.”
32. During the September 2017 Inspection, EPA recorded infrared FLIR videos of emissions from the open ends of two hoses in Truck Loading Lane No.1 (see Attachment C). Neither was equipped with cap, plug, or second valve to seal the hose.
33. By failing to equip each of the two hoses in Truck Loading Lane No 1 with cap, blind flange, plug or second valve to seal the open end at all times, UEOM violated 40 C.F.R. § 60.482-6a(a).

Valves and Connectors – First Attempt Within 5 Days

34. Pursuant to Subpart VVa at 40 C.F.R. § 60.482-11a(d), subject to certain exemptions, for each connector in gas/vapor or light liquid service, “a first attempt at repair shall be made no later than 5 calendar days after the leak is detected.”
35. Pursuant to Subpart VVa at 40 C.F.R. § 60.482-7a(d), subject to certain exemptions, for each valve in gas/vapor or light liquid service, “a first attempt at repair shall be made no later than 5 calendar days after each leak is detected.”
36. The LDAR database designates the valves listed in Attachment D as in gas vapor or light liquid service, and does not designate any exemption from the repair attempt requirements.
37. Attachment D identifies, for each of the listed valves, the tag number, the equipment type, the date the valve or connector was detected leaking, and the date the first attempt at repair was made.

38. By failing to make a first attempt at repair within 5 days after a leak was detected for each of the 7 valves identified in Attachment D, UEOM violated 40 C.F.R. § 60.482-7a(d) and 40 C.F.R. § 60.482-11a(d).

Pressure Relief Devices – Detectable Emissions Greater than 500 ppm

39. Pursuant to Subpart VVa at 40 C.F.R. § 60.482-4a(a), subject to certain exemptions, “each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background.”
40. The LDAR database designates each of the pressure relief devices listed in Attachment E as in gas/vapor service and does not designate any exemption from standard.
41. During the September 2017 Inspection, EPA (and UEOM) detected and measured emissions greater than 500 part per million (ppm) for each for each of the 75 pressure relief devices identified in Attachment E by date, process unit, equipment tag, EPA’s measurement and UEOM’s measurement.
42. By failing to operate each of the 75 pressure relief devices identified in Attachment E with detectable emissions less than 500 ppm, UEOM violated 40 C.F.R. § 60.482-4a(a)

Subpart Db – Findings and Violations

Hot Oil Heater – NOx CEMS and Initial Performance Test

43. NSPS Subpart Db (40 C.F.R. §§ 60.40b – 60.49b) applies, as relevant, to each steam generating unit that commenced construction after June 19, 1984 that has a heat input capacity greater than 100 million British thermal units per hour (MMBtu/hr). 40 C.F.R. § 60.40b(a).
44. The Hot Oil Process Heater at the Plant fires natural gas, has a design capacity of 150 MMBtu/hr, and was constructed after June 19, 1984.
45. Pursuant to 40 C.F.R. § 60.44b(a)(1)(i), on and after the date on which the initial performance test is completed or required to be completed under 40 C.F.R. § 60.18, NOx emissions from the Hot Oil Process Heater shall not exceed 0.10 lb/MMBtu.
46. Pursuant 40 C.F.R. § 60.8, the initial performance test for NOx was required to be completed not later than 180 days after initial startup of a subject steam generating unit.

47. Pursuant to 40 C.F.R. § 60.48b(b)(1), as relevant, the owner or operator of each steam generating unit shall install, calibrate, maintain a continuous emissions monitoring system (CEMS) for measuring NOx emissions.
48. By failing to conduct an initial performance test on the Hot Oil Process Heater for NOx, UEOM violated 40 C.F.R. § 60.8.
49. By failing to install, calibrate, maintain, and operate a CEMS for measuring NOx emissions from the Hot Oil Process Heater, UEOM violated 40 C.F.R. § 60.48b(b)(1).

NSPS Subpart Kb – Findings and Violations

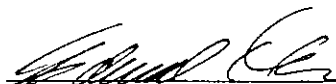
Storage Tank A – Leaks

50. Pursuant to Subpart OOOO at 40 C.F.R. § 60.5395(d), standards for storage tanks identified under that section do not apply to storage tanks subject to and controlled in accordance with the requirements for storage tanks under Subpart Kb.
51. Subpart Kb (40 C.F.R. §§ 60.110b – 60.117b) applies, as relevant, to each storage tank with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL), for which construction is commenced after July 23, 1984. 40 C.F.R. § 60.110b(a).
52. Subpart Kb at 40 C.F.R. § 60.112b(a) specifies the VOC standard for storage tanks with, as relevant, a design capacity greater than or equal to 151 m³, containing a VOL that, as stored has a maximum true vapor pressure equal to or greater than 5.2 kilopascals (kPa) but less than 76.6 kPa.
53. Storage Tank A has a design capacity greater than 151 m³, was constructed after July 23, 1984, and is used to store gasoline, a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 5.2 kPa but less than 76.6 kPa.
54. To comply with 40 C.F.R. § 60.112b(a), Storage Tank A is equipped with a fixed roof in combination with an internal floating roof, and, as such, is required to meet the specifications identified under 40 C.F.R. § 60.112b(a)(1).
55. Pursuant 40 C.F.R. § 60.112b(a)(1)(ii) – which requires an internal floating roof to have a closure device between the wall of the storage vessel and the edge of the internal floating roof – the internal floating roof of Storage Tank A is equipped with two seals. 40 C.F.R. § 60.112(b)(a)(1)(ii)(B) requires each of the two seals to form a continuous closure around the circumference of the tank.

56. Pursuant to 40 C.F.R. § 60.112b(a)(1)(vi), rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating.
57. During the September 2017 Inspection EPA recorded FLIR video of emissions leaking from the rim vents of Storage Tank A. At the time the internal roof was floating.
58. UEOM violated 40 C.F.R. § 60.112(b)(a)(1)(ii)(B) by failing to equip the internal roof with two seals that form a continuous closure around the circumference of the tank, and/or UEOM violated 40 C.F.R. § 60.112b(a)(1)(vi) by setting the rim vent gasket to open when the internal roof was floating.

2/9/18

Date



Edward Nam

Director

Air and Radiation Division

Attachment – A

Process Unit	Number of Pumps	Start-Up of Process Unit	Initial Monitoring Date
RAIL	10	August 10, 2013	February 7, 2014
RAIL	6	December 8, 2014	May 13, 2015
TNKFM	8	August 10, 2013	January 26, 2014
TNKFM	5	August 10, 2013	January 27, 2014
TNKFM	4	August 10, 2013	February 6, 2014
TNKFM	2	February 2, 2014	June 25, 2014
TNKFM	2	February 2, 2014	June 30, 2014
TNKFM	1	December 8, 2014	May 10, 2015
TNKFM	9	December 8, 2014	May 12, 2015
TRN1	1	July 28, 2013	February 5, 2014
TRN1	3	August 10, 2013	January 31, 2014
TRN1	5	August 10, 2013	February 5, 2014
TRN1	2	February 2, 2014	June 27, 2014
TRN1	1	February 2, 2014	June 28, 2014
TRN1	1	February 8, 2014	June 27, 2014
TRN2	3	April 13, 2014	October 4, 2014
TRN2	2	April 13, 2014	October 5, 2014
TRN2	1	April 13, 2014	October 9, 2014
TRN2	2	April 13, 2014	October 10, 2014
TRN3	5	December 8, 2014	April 28, 2015
TRN3	1	December 8, 2014	April 29, 2015
TRN3	1	December 8, 2014	April 30, 2015

Attachment – B

Process Unit	Number of Valves	Start-Up of Process Unit	Initial Monitoring Date
Railcar	176	August 10, 2013	January 29, 2014
Railcar	207	August 10, 2013	January 30, 2014
Railcar	252	August 10, 2013	January 31, 2014
Railcar	18	August 10, 2013	February 7, 2014
Railcar	1	August 10, 2013	February 20, 2014
Railcar	1	December 8, 2014	April 29, 2015
Railcar	387	December 8, 2014	May 12, 2015
Railcar	135	December 8, 2014	May 13, 2015
Railcar	59	March 1, 2016	May 5, 2016
Railcar	90	March 1, 2016	May 6, 2016
Railcar	4	March 1, 2016	May 30, 2016
TNKFM	2	August 7, 2013	September 7, 2014
TNKFM	385	August 10, 2013	January 26, 2014
TNKFM	311	August 10, 2013	January 27, 2014
TNKFM	252	August 10, 2013	January 29, 2014
TNKFM	141	August 10, 2013	January 30, 2014
TNKFM	8	August 10, 2013	February 1, 2014
TNKFM	17	August 10, 2013	February 4, 2014
TNKFM	112	August 10, 2013	February 7, 2014
TNKFM	6	August 10, 2013	February 8, 2014
TNKFM	4	September 7, 2013	September 7, 2014
TNKFM	152	February 2, 2014	June 25, 2014
TNKFM	72	February 2, 2014	June 30, 2014
TNKFM	5	February 2, 2014	July 25, 2014
TNKFM	1	February 2, 2014	November 27, 2014
TNKFM	1	December 8, 2014	April 29, 2015
TNKFM	91	December 8, 2014	May 10, 2015
TNKFM	296	December 8, 2014	May 12, 2015
TNKFM	45	December 8, 2014	May 13, 2015
TNKFM	1	December 8, 2014	May 15, 2015
TRN1	143	July 28, 2013	February 5, 2014
TRN1	245	August 10, 2013	January 31, 2014
TRN1	721	August 10, 2013	February 5, 2014
TRN1	125	August 10, 2013	February 6, 2014

TRN1	20	August 10, 2013	February 7, 2014
TRN1	158	August 10, 2013	February 8, 2014
TRN1	2	August 10, 2013	March 27, 2014
TRN1	369	February 2, 2014	June 27, 2014
TRN1	149	February 2, 2014	June 28, 2014
TRN1	200	February 2, 2014	June 29, 2014
TRN1	9	February 8, 2014	June 19, 2014
TRN1	262	February 8, 2014	June 27, 2014
TRN1	2	February 8, 2014	June 28, 2014
TRN1	67	February 8, 2014	June 29, 2014
TRN1	1	February 8, 2014	June 30, 2014
TRN1	6	February 8, 2014	July 25, 2014
TRN2	2	April 3, 2014	October 7, 2014
TRN2	48	April 13, 2014	September 27, 2014
TRN2	6	April 13, 2014	September 28, 2014
TRN2	583	April 13, 2014	October 3, 2014
TRN2	480	April 13, 2014	October 4, 2014
TRN2	476	April 13, 2014	October 5, 2014
TRN2	82	April 13, 2014	October 6, 2014
TRN2	152	April 13, 2014	October 7, 2014
TRN2	17	April 13, 2014	October 8, 2014
TRN2	2	April 13, 2014	October 9, 2014
TRN3	745	December 8, 2014	April 28, 2015
TRN3	721	December 8, 2014	April 29, 2015
TRN3	298	December 8, 2014	April 30, 2015
TRN3	1	December 8, 2014	May 7, 2015
TRN3	2	December 8, 2014	May 9, 2015
TRN3	109	December 8, 2014	May 11, 2015
TRN3	6	May 28, 2015	June 29, 2015

Attachment – C

Digital Image Log – See CD – UEO Harrison

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	MOV_2020.mp4	9/28/2017 3:05:30 PM	Rail car loading valve
2	MOV_2021.mp4	9/28/2017 3:13:28 PM	LD4-5
3	MOV_2022.mp4	9/28/2017 3:19:36 PM	LD4-5
4	MOV_2023.mp4	9/28/2017 3:22:26 PM	LD4-4
5	MOV_2024.mp4	9/28/2017 3:24:52 PM	LD3-3
6	MOV_2025.mp4	9/28/2017 3:27:18 PM	LD4-3
7	MOV_2026.mp4	9/28/2017 3:29:34 PM	LD4-2
8	MOV_2027.mp4	9/28/2017 3:33:06 PM	LD3-2
9	MOV_2028.mp4	9/28/2017 3:35:14 PM	LD4-1
10	MOV_2029.mp4	9/28/2017 3:37:00 PM	LD3-1
11	MOV_2030.mp4	9/28/2017 3:52:54 PM	LD2-5
12	MOV_2031.mp4	9/28/2017 3:54:50 PM	LD1-4
13	MOV_2032.mp4	9/28/2017 3:56:18 PM	LD2-4
14	MOV_2033.mp4	9/28/2017 4:24:56 PM	Truck loading lane 1
15	MOV_2036.mp4	9/28/2017 4:59:04 PM	Tank A vents
16	MOV_2037.mp4	9/28/2017 5:08:38 PM	Flare stage and loading

Attachment – D

Tag Number	Date Inspected	Attempt Date	Equipment Type
12751	April 27, 2017	May 5, 2017	VLV
20089	March 27, 2017	June 19, 2017	PRV
24804	March 27, 2017	June 19, 2017	PRV
24834	March 27, 2017	June 19, 2017	PRV
24865	March 27, 2017	June 19, 2017	PRV
24984	March 27, 2017	June 19, 2017	PRV
24989	March 27, 2017	June 19, 2017	PRV

VLV = Valve, PRV= Pressure Relief Valve

Attachment – E

Date	Process Unit	Equipment Tag #	Equipment Type	EPA's Reading (ppm)	UEO's Reading (ppm)
9/28/2017	Railcar	17164	PSV	570	8250
9/28/2017	Railcar	17119	PSV	1000	flame out
9/28/2017	Railcar	17115	PSV	1200	3469
9/28/2017	Railcar	17090	PSV	1500	20000
9/28/2017	Railcar	17060	PSV	1500	20000
9/28/2017	Railcar	17047	PSV	2800	10000
9/28/2017	Railcar	17033	PSV	1900	10000
9/28/2017	Railcar	17003	PSV	880	3515
9/28/2017	Railcar	16999	PSV	770	1791
9/28/2017	Railcar	16986	PSV	580	3488
9/28/2017	Railcar	16982	PSV	3400	10000
9/28/2017	Railcar	16949	PSV	2700	10000
9/28/2017	Railcar	16273	PSV	1400	1400
9/28/2017	Railcar	16283	PSV	14000	14000
9/28/2017	Railcar	16311	PSV	9600	confirmed
9/28/2017	Railcar	16315	PSV	2000	confirmed
9/28/2017	Railcar	16329	PSV	2080	confirmed
9/28/2017	Railcar	16341	PSV	20000	confirmed
9/28/2017	Railcar	16370	PSV	13700	confirmed
9/28/2017	Railcar	16374	PSV	805	confirmed
9/28/2017	Railcar	16396	PSV	650	confirmed
9/28/2017	Railcar	16400	PSV	16000	confirmed
9/28/2017	Railcar	16429	PSV	21000	27000
9/28/2017	Railcar	16441	PSV	5600	2643
9/28/2017	Railcar	4155	PSV	2100	745
9/28/2017	Railcar	4179	PSV	1365	1098
9/28/2017	Railcar	4244	PSV	1800	2672
9/28/2017	Railcar	4279	PSV	1300	2275
9/27/2017	Railcar	17177	PSV	4300	16000
9/27/2017	Railcar	17231	PSV	5800	9999
9/27/2017	Railcar	17292	PSV	830	1400
9/27/2017	Railcar	4971	PSV	5100	16000
9/27/2017	Railcar	16479	PSV	15000	19800
9/27/2017	Railcar	16739	PSV	1600	30170

9/27/2017	Railcar	16536	PSV	20500	48250
9/27/2017	Railcar	16666	PSV	1550	5310
9/27/2017	Railcar	16623	PSV	980	2000
9/27/2017	Railcar	16120	PSV	745	2780
9/27/2017	Railcar	16129	PSV	6800	7200
9/27/2017	Railcar	16153	PSV	15800	23800
9/27/2017	Railcar	16170	PSV	18800	33760
9/27/2017	Railcar	16174	PSV	20000	35500
9/27/2017	Railcar	16203	PSV	20600	16800
9/27/2017	Railcar	16211	PSV	1350	15750
9/27/2017	Railcar	16225	PSV	16500	44400
9/27/2017	Railcar	16252	PSV	1425	907
9/27/2017	Railcar	16262	PSV	20500	30000

CERTIFICATE OF MAILING

I certify that I sent a Finding of Violation, No. EPA-5-18-OH-04, by Certified Mail, Return Receipt Requested, to:

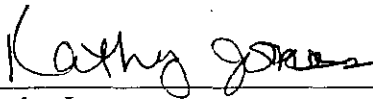
Christopher Bender, Environmental Compliance Coordinator
Utica East Ohio Midstream LLC
Harrison Hub Fractionation Plant
37905 Crimm Road, Scio, Ohio 43988
Scio, Ohio 43988

I also certify that I sent copies of the Finding of Violation by first-class mail to:

Bob Hodanbosi, Chief
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On the 13th day of February 2018



Kathy Jones
Program Technician
AECAB, PAS

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